Mastering Transfer Pricing: Strategies for Global Taxation

21 – 25 December 2026
Tokyo (Japan)



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Why This Course

In a globalized economy, transfer pricing has become one of the most scrutinized areas of international taxation. Multinational enterprises must comply with complex regulations, justify intercompany pricing structures, and manage increasing regulatory pressures driven by the OECD, BEPS initiatives, and local tax authorities. A strong grounding in transfer pricing is essential for mitigating tax risks, supporting compliance, and ensuring sustainable global business operations.

The Transfer Pricing Fundamentals Program is a comprehensive 1-week course designed to equip participants with the technical knowledge and practical skills needed to understand, apply, and manage transfer pricing across diverse business models. Through case studies, hands-on exercises, and expert-led insights, attendees will develop the ability to conduct functional analyses, select appropriate pricing methods, and navigate documentation requirements with confidence.

What You'll Learn and Practice

By completing this program, participants will be able to:

- Understand transfer pricing concepts, global frameworks, and the role of the OECD Guidelines
- Apply the arm's length principle and conduct thorough comparability analyses
- Evaluate and select transfer pricing methods based on real-world business scenarios
- Perform functional and economic analyses, including value chain assessments
- Prepare compliant transfer pricing documentation and manage reporting obligations
- Navigate audits, disputes, and advanced mechanisms such as APAs and MAP

The Program Flow

Day 1 - Introduction to Transfer Pricing

- Foundational concepts and guiding principles
- Overview of OECD Guidelines and international standards
- Understanding the arm's length principle and comparability factors
- Transfer pricing within the BEPS framework and global tax developments



Day 2 - Transfer Pricing Methods

- Traditional transaction methods: CUP, Resale Price, Cost Plus
- Transactional profit methods: TNMM, Profit Split
- Criteria for method selection and practical application challenges
- Case studies demonstrating method selection and implementation

Day 3 - Functional & Economic Analysis

- Conducting detailed functional analyses of personnel, assets, and risks
- Industry analysis and economic context evaluation
- Value chain analysis and global business models
- Benchmarking studies, databases, and use of comparables

Day 4 - Documentation & Compliance

- Documentation standards under Action 13 and local regulations
- Master File, Local File, and Country-by-Country Reporting CbCR
- Risk assessment frameworks for transfer pricing
- Advance Pricing Agreements APAs: process, benefits, and strategic use

Day 5 - Advanced Topics & Dispute Resolution

- Transfer pricing approaches for intangibles and financial transactions
- Preparing for and managing tax authority audits
- Dispute resolution mechanisms, Mutual Agreement Procedures MAP, and arbitration
- Trends shaping the future of transfer pricing, including digitalization and global minimum tax

Practical Wins for Participants

Participants will complete the program able to:

- Design and implement compliant, value-driven transfer pricing policies
- Prepare and review transfer pricing documentation aligned with global standards
- Mitigate transfer pricing risks and proactively manage regulatory audits
- Apply analytical, economic, and documentation skills to optimize cross-border pricing structures

Organizational Impact

Organizations benefit through:

- Stronger compliance with international tax regulations
- Reduced exposure to disputes, adjustments, and penalties
- Improved alignment between business operations and transfer pricing models
- Enhanced capability to support global tax strategies and value creation



Training Methodology

This program integrates:

- Practical transfer pricing exercises
- Real-world case studies and industry examples
- Group discussions and benchmarking simulations
- Expert-led deep dives into complex transactions and regulatory frameworks

Beyond the Course

Participants return ready to:

- Lead or support transfer pricing initiatives across global business units
- Engage confidently with tax authorities and advisors
- Strengthen their organization’s compliance and strategic tax planning
- Adapt to evolving regulations and future developments in international taxation

